# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

|                               | <ul> <li>Obj. Deadline: April 7, 2025 at 4:00 p.m. (ET)</li> <li>Hearing Date: April 17, 2025 at 10:00 a.m. (ET)</li> </ul> |
|-------------------------------|---|
| Debtors.                      | ) (Jointly Administered)  |
| LIGADO NETWORKS LLC, et al.,1 | ) Case No. 25-10006 (TMH)   |
| In re:                        | ) Chapter 11  |

## NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE that, on March 22, 2025, Ligado Networks, LLC and its above-captioned affiliates, as debtors and debtors in possession (collectively, the "Debtors") filed the Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the AST Definitive Documents and (II) Granting Related Relief (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **April 7, 2025 at 4:00 p.m.** (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable Thomas M. Horan, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801 on April 17, 2025 at 10:00 a.m. (prevailing Eastern Time).

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors' headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

Case 25-10006-TMH Doc 359-1 Filed 03/26/25 Page 2 of 3

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

[Remainder of page intentionally left blank.]

Dated March 22, 2025 Wilmington, Delaware

## /s/ Michael J. Merchant

Mark D. Collins, Esq. (Bar No. 2981) Michael J. Merchant, Esq. (Bar No. 3854) Amanda R. Steele, Esq. (Bar No. 5530) Emily R. Mathews, Esq. (Bar No. 6866) RICHARDS, LAYTON & FINGER, P.A.

One Rodney Square 920 North King Street Wilmington, DE 19801

Telephone: (302) 651-7700 Facsimile: (302) 651-7701 Email: collins@rlf.com

> merchant@rlf.com steele@rlf.com mathews@rlf.com

-and-

Dennis F. Dunne, Esq. (admitted *pro hac vice*) Matthew L. Brod, Esq. (admitted *pro hac vice*) Lauren C. Doyle, Esq. (admitted *pro hac vice*)

### MILBANK LLP

55 Hudson Yards

New York, New York 10001 Telephone: (212) 530-5000 Facsimile: (212) 530-5219

Email: ddunne@milbank.com

mbrod@milbank.com ldoyle@milbank.com

Andrew M. Leblanc, Esq. (admitted pro hac vice)

### MILBANK LLP

1850 K Street, NW, Suite 1100

Washington DC 20006

Telephone: (202) 835-7500 Facsimile: (202) 263-7586

Email: aleblanc@milbank.com

Co-Counsel for Debtors in Possession